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March 24, 2003

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Ms. Marlene H Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Richardson Certification Filing for the Adanis County 6-911 in Colorado
WT Docket No. 01-70

Dear Ms. Dortch:

Pursuant to the City of Richardson Reconsidel-ation Order,[1] enclosed is T-Mobile USA, Inc.'s certification with respect to the E911 request it has received from the Adams County E-911 in Colorado.

Please contact me at 202-654-5900 with any questions or concerns

Sincerely,

Robert A. Calaff
Senior Corporate Counsel
Governmental and Industry Affairs

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[1] Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems. CC Docket No. 94-102, *Order on Reconsideration*, rel. Nov. 26, 2002 (City of Richardson Reconsideration Order).

No. of Copies rec'd__ 0+4
List A?CDE

CERTIFICATION OF TIM WONG
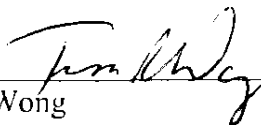
I. Tim Wong, certify:

1. This certification is made on behalf of T-Mobile USA, Inc. ("T-Mobile") under Section 20.18(j)(4) of the Commission's rules, 47 C.F.R. § 20.18(j)(4).

2. I am Chief Technology Officer of T-Mobile. As Chief Technology Officer, I am responsible for and have general knowledge or T-Mobile's deployment of E-911 service. To the extent this certification discusses E911 deployment on the Public Safety Answer Point's ("PSAP") side of the demarcation point, those portions of this certification are based on T-Mobile's best understanding of those facts and circumstances, which is based largely on the representations of the PSAP and/or its Local Exchange Carrier ("LEC").

3. Adanis County E-911, in Colorado, requested Phase I E911 service on 3/15/1998. More than six months have elapsed since the date of receipt of this request, and the deployment has not been completed.

4. To the best of my knowledge, the PSAP known as Adams County E-911 is currently not able to receive and utilize Phase I E911 data elements. I describe below the basis for this determination and reasons why further implementation efforts cannot be made until the PSAP becomes capable of receiving and utilizing the data elements associated with the E911 service requested.

      (i)   T-Mobile is implementing Adanis County E-911's request for Phase I E911 service using non-call associated signaling (NCAS) and an E2 interface Adams County E-911's ALI database - which is on the PSAP's side of the demarcation point – is currently not able to receive and utilize Phase I data elements transmitted using NCAS and an E2 interface.

      (ii)   Qwest is the 911 System Service Provider (SSP) for Adams County E-911 and provides the ALI database to the PSAP. Although Qwest has the technical capability to do so, and has now agreed to implement a change to its ALI database, it has not yet upgraded the ALI database interface in this manner so that Adanis County E-911 would be capable of receiving Phase I E911 service using the E2 interface.

      (iii)   Until Qwest upgrades the ALI database, T-Mobile cannot complete Mobile Switching Center and Gateway Mobile Location Center data translations because, as a practical matter, these translations must be completed close in time to final deployment to avoid repeating the translations due to underlying network changes, or test the requested service, and Adams County E-911 will not be able to receive and utilize the E911 data elements transmitted by T-Mobile.

5. Listed in Attachment **"A,"** attached hereto, are the specific steps T-Mobile has taken to provide the requested service lo Adams County E-911, and the specific steps that remain to be conipleted by T-Mobile. "Yes" means T-Mobile has completed that step. "Incapable" means T-Mobile cannot complete that step until the PSAP or LEC completes

certain prerequisite steps, as described above. "N/A" means that the specific step in not applicable to the requested service in this instance (*i.e.*, it is a Phase I request and the specific step listed is Phase II only).

6. Listed in Attachment "B," attached hereto, are the specific steps that remain to be completed by the PSAP or other parties before T-Mobile can provide the E911 service requested. "Yes" means that, to the best of T-Mobile's understanding, the PSAP has completed that step. "No" means that, to the best of T-Mobile's understanding, the PSAP or other responsible party, has not completed that step. "N/A" means that the step is not applicable to the requested service in this instance. "Unknown" means that T-Mobile does not have sufficient knowledge to make any determination regarding the status of that step.

7. In accordance with Section 20.18(j)(4)(i) of the Commission's rules, on March 3, 2003, T-Mobile provided, by overnight, express delivery, written notice to Adams County E-911 of T-Mobile's intent to file this certification. Adams County E-911 did not respond to that notice.

I certify under penalty of perjury that the foregoing is true and correct

Executed on March __2·1__ , *2003,* by:

_____
Tim Wong
Chief Technology Officer

ATTACHMENT A to Certification of Tim Wong
Steps taken by T-Mobile toward E911 Implementation for Adams County E-91

☒Yes ☐Incapable ☐N/A — Built, tested, and integrated the Gateway Mobile Location Center ("GMLC") into T-Mobile's network

☐Yes ☐Incapable ☒N/A — Built, tested, and integrated the Serving Mobile Location Center ("SMLC") into T-Mobile's network (Phase II only)

☐Yes ☐Incapable ☒N/A — Built, tested, and integrated Location Measurement Unit(s) ("LMU") (Phase II, EOTD only)

☒Yes ☐Incapable ☐N/A — Upgraded, tested, and patched software in Mobile Switching Center(s) ("MSC")

☒Yes ☐Incapable ☐N/A — Upgraded, tested, and patched software in Base Station Controller(s)

☒Yes ☐Incapable ☐N/A — Requested selective router location (CLLI codes) from the PSAP or obtained location from an alternate source

☒Yes ☐Incapable ☐N/A — Sent coverage map(s) to the PSAP

☒Yes ☐Incapable ☐N/A — Sent data file(s) to the PSAP

☒Yes ☐Incapable ☐N/A — Requested routing instructions from the PSAP

☒Yes ☐Incapable ☐N/A — Prepared network design diagram

☒Yes ☐Incapable ☐N/A — Performed trunk sizing (*i.e.*, determined the number of trunks required)

☒Yes ☐Incapable ☐N/A — Completed forms and exhibits for ordering trunks from LEC

☒Yes ☐Incapable ☐N/A — Obtained PSAP authorization to order trunks, if applicable

☒Yes ☐Incapable ☐N/A — Ordered trunk(s) from LEC

ATTACHMENT A
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ATTACHMENT A to Certification of Tim Wong
Steps taken by T-Mohile toward E911 Implementation for Adams County E-911

☒ Yes ☐ Incapable ☐ N/A   Ordered transport from LEC, if applicable

☐ Yes ☐ Incapable ☒ N/A   Tested trunks

☒ Yes ☐ Incapable ☐ N/A   Requested pANI assignment from LEC or obtained from an alternate source

☒ Yes ☐ Incapable ☐ N/A   Completed data file for delivery to PSAP

☒ Yes ☐ Incapable ☐ N/A   Sent data file to PSAP

☒ Yes ☐ Incapable ☐ N/A   Completed date file for delivery to ALI database provider

☒ Yes ☐ Incapable ☐ N/A   Sent data file to ALI database provider

☒ Yes ☐ Incapable ☐ N/A   Performed MSC data translation (script allowing routing of E911 voice to correct PSAP and identification of the receiving lower)

☒ Yes ☐ Incapable ☐ N/A   Performed GMLC data translation (script allowing routing of E911 data to correct PSAP and identification of the receiving lower)

☐ Yes ☐ Incapable ☒ N/A   Scheduled resting **with** PSAP

☐ Yes ☐ Incapable ☒ N/A   Performed profile test

☐ Yes ☐ Incapable ☒ N/A   Performed field test

☐ Yes ☐ Incapable ☒ N/A   Reconciled field test

☐ Yes ☐ Incapable ☒ N/A   Perfomied retest, if applicable

☐ Yes ☐ Incapable ☒ N/A   Accepted testing (provisioning complete)

ATTACHMENT A
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ATTACHMENT B to Certification of Tim Wong
Actions Required By Adams County E-911 Or Other Parties Before T-Mobile Can
Complete E911 Implementation

☐ Yes ☐ No ☒ N/A ☐ Unknown   Requested service from LEC (PSAP)

☒ Yes ☐ No ☐ N/A ☐ Unknown   Sent selective router location (CLLI codes) to T-Mobile (PSAP)

☒ Yes ☐ No ☐ N/A ☐ Unknown   Sent routing instructions to T-Mobile (PSAP)

☐ Yes ☐ No ☒ N/A ☐ Unknown   Upgraded Customer Premises Equipment ("CPE") (including Coinputer Aided Dispatch ("CAD"), Geographic Information System ("GIS"), and 10-digit capability) (PSAP)

☒ Yes ☐ No ☐ N/A ☐ Unknown   Built Master Street Address Guide ("MSAG") (PSAP)

☐ Yes ☐ No ☒ N/A ☐ Unknown   Completed data file upload (LEC)

☐ Yes ☐ No ☒ N/A ☐ Unknown   Upgraded ALI database, if applicable (LEC)

☐ Yes ☐ No ☒ N/A ☐ Unknown   Upgraded selective router, if applicable (LEC)

☐ Yes ☐ No ☒ N/A ☐ Unknown   Provisioned trunks for T-Mobile (LEC)

☐ Yes ☐ No ☒ N/A ☐ Unknown   Provisioned or upgraded trunks for PSAP (from Phase zero to Phase I or II), if applicable (LEC)

ATTACHMENT B
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